

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

UMBERTO CAVALIERI and FLOYD MIKLIC,

Plaintiffs,

V.

GENERAL ELECTRIC COMPANY, GE ASSET
MANAGEMENT INCORPORATED, JOHN MYERS,
JOHN J. WALKER, JEFFREY R. IMMELT, SIR
WILLIAM CASTELL, ROBERT C. WRIGHT, JAMES I.
CASH, JR., ANN M. FUDGE, CLAUDIO X. GONZALEZ,
ANDREA JUNG, A.G. LAFLEY, ROBERT W. LANE,
RALPH S. LARSEN, ROCHELLE B. LAZARUS, SAM
NUNN, ROGER S. PENSKE, ROBERT J. SWIERINGA,
DOUGLAS A. WARNER III, PHILIP D. AMEEN,
LAWRENCE CARUSO, and JOHN DOES 1-100,

Defendants.

ROBERT R. BEZIO,

Plaintiff,

V.

GENERAL ELECTRIC COMPANY, GE ASSET
MANAGEMENT INCORPORATED, JOHN MYERS,
JOHN J. WALKER, JEFFREY R. IMMELT, SIR
WILLIAM CASTELL, ROBERT C. WRIGHT, JAMES I.
CASH, JR., ANN M. FUDGE, CLAUDIO X. GONZALEZ,
ANDREA JUNG, A.G. LAFLEY, ROBERT W. LANE,
RALPH S. LARSEN, ROCHELLE B. LAZARUS, SAM
NUNN, ROGER S. PENSKE, ROBERT J. SWIERINGA,
DOUGLAS A. WARNER III, PHILIP D. AMEEN,
LAWRENCE CARUSO, and JOHN DOES 1-100,

Defendants.

Case No. 06-CV-0315 (GLS)(DRH)

Case No. 06-CV-0381 (GLS)(DRH)

**DECLARATION OF JEFFREY J. SHERRIN IN SUPPORT OF
PLAINTIFFS' AMENDED MOTION FOR (1) CONSOLIDATION, (2) INTERIM LEAD
PLAINTIFF APPOINTMENT AND LEADERSHIP STRUCTURE APPROVAL,
AND (3) ENTRY OF [PROPOSED] PRETRIAL ORDER NO. 1**

I, Jeffrey J. Sherrin, hereby declare under penalty of perjury:

1. I am an attorney admitted to practice law in the United States District Court for the Northern District of New York and a partner with the law firm of O'Connell & Aronowitz, counsel for Umberto Cavalieri, Floyd Miklic and Robert R. Bezio (collectively, the "ERISA Plaintiffs") in the above captioned actions.

2. I submit this declaration in support of the ERISA Plaintiffs' Amended Motion for entry of [Proposed] Pretrial Order No. 1: (1) consolidating the above-captioned actions; (2) appointing the ERISA Plaintiffs as Interim Lead Plaintiffs on behalf of a proposed class of participants and beneficiaries of the GE Savings & Security Program; and (3) appointing Milberg Weiss Bershad & Schulman LLP and Lerach Coughlin Stoia Geller Rudman & Robbins LLP as Interim Co-Lead counsel and O'Connell & Aronowitz as interim liaison counsel for the proposed class.

3. Attached hereto as Exhibit A is a copy of the Order appointing a lead plaintiff in *In re Boston Scientific ERISA Litigation*, No. 06-cv-10105 (D. Mass.).

4. Attached hereto as Exhibit B is a copy of the Order appointing a lead plaintiff in *In re Royal Dutch/Shell Petroleum ERISA Litigation*, No. 04-1398 (D.N.J.).

5. Attached hereto as Exhibit C is a copy of the firm resume of Milberg Weiss Bershad & Schulman LLP.

6. Attached hereto as Exhibit D is a copy of the firm resume of Lerach Coughlin Stoia Geller Rudman & Robbins LLP.

7. Attached hereto as Exhibit E is a copy of the Order appointing co-lead counsel in *In Re Sears, Roebuck & Co. ERISA Litigation*, No. 02 C 8324, (N.D. Ill.).

8. Attached hereto as Exhibit F is a copy of the Order appointing co-lead counsel in *In Re: Royal Ahold N.V. Securities & ERISA Litigation*, No. 1:03-MD-01539 (D. Md.).

9. Attached hereto as Exhibit G is a copy of the firm resume of O'Connell & Aronowitz.

Dated: June 5, 2006

s/ Jeffrey J. Sherrin
Bar Roll No. 102601